

**IN THE UNITED STATES DISTRICT COURT FOR THE
WESTERN DISTRICT OF MISSOURI
SOUTHERN DIVISION**

UNITED STATES OF AMERICA,

Plaintiff,

v.

QUINTON HAYWOOD,

Defendant.

Case No. 18-03013-05-CR-S-BP

MOTION FOR DETENTION

Comes now the United States of America, by and through Timothy A. Garrison, United States Attorney for the Western District of Missouri, and the undersigned Assistant United States Attorney, and hereby moves this Court to order the detention of the defendant, QUINTON HAYWOOD, and states the following in support of the motion:

1. An indictment has been filed charging the defendant with cargo theft, in violation of Title 18, United States Code, Section 659, and possession of stolen firearms, in violation of Title 18, United States Code, Section 922(j).
2. Title 18, United States Code, Section 3142(f) provides, in pertinent part, that hearing must be held by the appropriate judicial officer to determine whether any condition or combination of conditions “will reasonably assure the appearance of such person as required and the safety of any other person and the community” if the attorney for the Government moves for such a hearing and the case involves:

“(E) any felony that is not otherwise a crime of violence that involves... the possession or use of a firearm... .”
3. The defendant has been previously convicted of burglary and organized retail theft.
4. The defendant is a resident of Texas and has no discernable ties to the State of Missouri.

5. The defendant, along with his co-defendants, stole over 600 firearms from an interstate shipment. The vast majority of said firearms have not been recovered.
6. The defendant's DNA profile was identified as being present in the stolen vehicle used to transport the firearms from Missouri to Texas.

Wherefore, based upon the foregoing, the United States submits that there is clear and convincing evidence that there are no conditions which the Court could place upon the defendant that would reasonably assure the defendant's appearance in Court and the safety of the community. The Government therefore requests that a detention hearing be held and that the defendant be detained pending trial of this matter.

Respectfully submitted,

Timothy A. Garrison
United States Attorney

By: /s/ James J. Kelleher
James J. Kelleher
Assistant United States Attorney
Missouri Bar No. 51921

CERTIFICATE OF SERVICE

The undersigned hereby certifies that a copy of the foregoing was delivered on January 29, 2018, to the CM-ECF system of the United States District Court for the Western District of Missouri for electronic delivery to all counsel of record.

/s/ James J. Kelleher

James J. Kelleher

Assistant United States Attorney